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**ORAL TESTIMONY OF THE  
NATIONAL BIODIESEL BOARD (NBB)**

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**U.S. Department of Energy  
Office of Energy Efficiency and Renewable Energy,  
FreedomCAR and Vehicle Technologies Program**

**PUBLIC WORKSHOP ON  
“Alternative Fuel Transportation Program: Alternative Compliance”**

**July 12, 2006**

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The National Biodiesel Board appreciates the opportunity to offer these comments on the Department of Energy's proposed rule on "Alternative Fuel Transportation Program: Alternative Compliance. We would like to make two brief points about the rule as proposed.

First, we want to publicly state our support for DoE's Energy Efficiency and Renewable Energy Program staff for drafting these comments as they did. We want to commend DoE in two important areas:

1. Federal, state and utility fleets are an important partner for the biodiesel industry, and therefore we were very pleased to see that DoE is providing them, in this proposed rule, maximum flexibility for compliance. By not including limiting compliance provisions, we believe that the regulated community will be able to use those methods most applicable and beneficial to their respective fleets, the communities in which they are located, and the federal government as a whole.
2. Second, we firmly believe that it the congressional intent when enacting this language was not to restrict any particular technology in any way. Therefore, we commend DoE for adhering to this congressional intent by allowing fleets to meet the petroleum reduction levels in their most appropriate manner. Certainly we agree that there should be no cap on the usage of biodiesel use to meet these reduction levels. As many of you know, biodiesel is a domestically produced, renewable fuel that can be used in unmodified diesel engines. Testing confirms that biodiesel is non-toxic, readily biodegradable, and reduces serious air pollutants such as carbon monoxide, carbon dioxide, unburned hydrocarbons, particulates, sulfur emissions and air toxics. It just makes sense that its usage in federal fleets to reduce petroleum consumption should not be limited in any way.

Again, we appreciate the opportunity to provide oral testimony at this hearing, and we intend to also submit written comments on this proposed rule. We encourage DoE to maintain the maximum flexibility for federal, state and utility fleets to comply with the alternative compliance provisions. If you need any other information, please do not hesitate to contact me.